

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	§	
	§	
v.	§	NO. 19-cr-246 (MCA)
	§	
CREAGHAN HARRY,	§	
	§	
Defendant.	§	
	§	

**MOTION TO SEAL AND FOR LEAVE TO FILE *EX PARTE*
OF THE PROSECUTION TEAM IN THIS PROCEEDING**

The United States respectfully submits this motion seeking an Order to Seal and for leave to file *ex parte* of the Prosecution Team in this proceeding the Filter Team’s Motion for an Order Determining that Certain Documents Produced to Defendant in Case Number 20-cr.773 Under Federal Rule of Evidence 502(d) Are Not Privileged, along with accompanying exhibits, copies of the 11 documents that are at issue, and a Proposed Order. The United States Filter Team’s motion brief discusses documents produced to Defendant Adarsh Gupta under Rule 502(d) that, pursuant to this Court’s order in Case Number 20-cr-773, Dkt. No. 113, may not be shared with members of the prosecution team in *United States v. Harry* who are also members of the prosecution team in *United States v. Gupta*.

Accordingly, to avoid public disclosure or disclosure of the members of the prosecution team in this matter who are also members of the prosecution team in *United States v. Gupta*, the government requests that the instant motion, its accompanying exhibits, copies of the 11 documents that are at issue, and Proposed Order be sealed and filed *ex parte* of the prosecution team in this docket.

PLEASE TAKE NOTICE that a proposed form of Order is submitted with this motion.

Respectfully submitted,

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Dated: April 1, 2024

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing
was electronically filed via CM/ECF on April 1, 2024.

/s/ Steven S. Michaels
Steven S. Michaels
Trial Attorney